

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE MIDDLE DISTRICT OF TENNESSEE  
3                   NASHVILLE DIVISION  
  
4                   MICHAEL DAVID SILLS and )  
5                   MARY SILLS,                 )  
6   )  
7                   Plaintiffs,                 )  
8   ) Case No. 3:23-cv-00478  
9                   VS.                         ) Judge William L. Campbell, Jr.  
10   ) Magistrate Judge  
11                   SOUTHERN BAPTIST          ) Jeffery S. Frensley  
12                   CONVENTION, a non-profit)  
13                   corporation, et al,        )  
14   )  
15                   Defendants.                )  
16   X

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17   VIDEOTAPED DEPOSITION OF MARY SILLS  
18   TAKEN ON OCTOBER 3, 2024  
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22                   Prepared by:  
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1                   THE WITNESS: Bart Barber. I don't remember  
2 the rest of the people.

3 BY MS. CALLAS:

4 Q. That's fine. So you remember three. You  
5 mentioned Jennifer Lyell. I think you mentioned the  
6 Southern Baptist Convention; is that right?

7 A. Yes.

8 Q. And Bart Barber?

9 A. Yes.

10 Q. Tell me what the Southern Baptist Convention  
11 has done, that is, what conduct they've engaged in, that  
12 has --

13 A. They are ultimately responsible for the  
14 actions of Bart Barber, who represents them and also  
15 represents Baptist Press, who was greatly involved in  
16 this, and Guidestone [sic], as well.

17 Q. So the Southern Baptist Convention is  
18 ultimately responsible for those entities and people  
19 you've identified. Tell me what Bart Barber has done  
20 specifically to harm you, Mary Sills.

21 A. He retweeted a tweet from Eric Geiger that  
22 said I was complicit in this inappropriate relationship  
23 with Jennifer Lyell. And I have never met the man,  
24 never spoken to the man, don't know the man. And he  
25 said that about me. He doesn't know me.

1           Q.     And this is Bart Barber you're speaking of?  
2           A.     Yes.  
3           Q.     Do you know Eric Geiger?  
4           A.     Only from her talking about him.  
5           Q.     And this would be Jennifer talking about Eric  
6     Geiger?

7           A.     Yes.

8           Q.     And this -- when would she have talked about  
9     him, if you remember?

10          A.     She would -- we would have conversations all  
11     the time, and she would talk to me about her work. And  
12     he was her boss.

13          Q.     Did you ever have an interaction with him?

14          A.     No.

15          Q.     Did you form any impression of him based on  
16     Jennifer's comments about him?

17          A.     Not really.

18          Q.     I mean, were her comments positive, or  
19     negative, or you don't have a recollection?

20          A.     Both, I'm sure.

21          Q.     Did you form any opinion or impression of her  
22     view of him, meaning whether she viewed him positively  
23     or negatively?

24          A.     No.

25          Q.     So you've mentioned Bart Barber retweeting a

1    tweet of Eric Geiger; is that correct?

2            A.     Yes.

3            Q.     What about the Baptist Press, what statement  
4 has the Baptist Press made about Mary Sills?

5            A.     I don't know if that's specifically about me,  
6 but if it involves my husband, it involves me.

7            Q.     And what about -- you said Guidestone, and  
8 I'll -- Guidepost.

9            A.     Post, sorry.

10          Q.     So you've mentioned Guidepost. What  
11 statement did Guidepost make about Mary Sills?

12          A.     Not about me, specifically. But, again, when  
13 you talk about my husband, you talk about me.

14          Q.     There are other defendants. Do you  
15 understand there are other defendants you have sued?

16          A.     Yes.

17          Q.     And you don't recall the specific names; is  
18 that right?

19          A.     Yes.

20          Q.     I will identify them for you, and you can  
21 tell me what you understand they have done or how  
22 they've acted to harm you, Mary Sills?

23          A.     Okay.

24          Q.     Ed Litton is one of those people.

25          A.     Also a member of the Southern Baptist

1     Convention and the Executive Committee responsible for  
2     the actions of their people.

3           Q.     And those people are?

4           A.     Anyone that is employed by the Southern  
5     Baptist Convention.

6           Q.     Okay. And so which of those people employed  
7     by the Southern Baptist Convention do you allege have  
8     harmed you, Mary Sills?

9           A.     Bart Barber, specifically.

10          Q.     So Ed Litton is, if I understand what you've  
11     said -- and I know you are not a lawyer, but you're  
12     telling me what your case is about. Ed Litton is  
13     responsible for what Bart Barber had to say, in your  
14     words?

15               MS. RILEY: Object to the form.

16               THE WITNESS: Ultimately, he is responsible.

17     BY MS. CALLAS:

18          Q.     Did he have any separate conduct that you  
19     know of that you allege was harmful to you?

20          A.     No.

21          Q.     What about Rolland Slade?

22          A.     Again, he is part of the Executive Committee.  
23     The buck stops with him.

24          Q.     And Rolland Slade, you would attribute  
25     responsibility for Bart Barber's tweet; is that right?

1           A.     Yes.

2           Q.     Did Rolland Slade engage in any conduct,  
3 himself, that you allege was harmful to you?

4           A.     No.

5           Q.     Willie McLaurin is another defendant?

6           A.     The same.

7           Q.     Now, you've not mentioned the seminary. Do  
8 you know that you have sued the seminary?

9           A.     Again, the seminary is part of the Southern  
10 Baptist Convention, therefore, they're responsible, too.

11          Q.     And is there any particular person or  
12 statement that was made that you attribute to the  
13 seminary, or are we -- you know, we've talked about Bart  
14 Barber, Guidepost, and the Baptist Press?

15          A.     When an entity is big, like the Southern  
16 Baptist Convention, there are a lot of people that are  
17 supposed to report. And the people at the top are  
18 responsible for whatever is said by any of their people,  
19 ultimately. And Dr. Mohler is a representative of the  
20 Southern Baptist Theological Seminary, which is part of  
21 the Southern Baptist Convention. And it all trickles  
22 down.

23          Q.     Is it correct, Mrs. Sills, that the only  
24 statement made about you was the retweet by Bart Barber?

25          A.     That I know of.

1           Q.     You mentioned the Baptist Press. Did your  
2     name appear in any Baptist Press article or press  
3     release, if you recall?

4           A.     I don't recall.

5           Q.     Did your name appear in the Guidepost report,  
6     if you know?

7           A.     I don't know.

8           Q.     Did you look for your name in the report?

9           A.     I didn't want to read the whole report.

10              MS. CALLAS: Why don't we -- let's take a  
11     five- or ten-minute break. We may come back, or have  
12     lunch, or do something, but we'll take a little break.

13              THE VIDEOGRAPHER: Off the record at 11:42.

14              (Recess observed.)

15              THE VIDEOGRAPHER: Back on the record at  
16     12:27.

17     BY MS. CALLAS:

18           Q.     Mrs. Sills, what year did your daughter  
19     graduate from college?

20           A.     2009? I don't remember.

21           Q.     Do you recall that Jennifer Lyell attended  
22     some aspect of the graduation ceremony or celebration?

23           A.     I don't remember.

24           Q.     Did you ever have a conversation with Molly  
25     -- instead of saying ever, let me say around the time of

1

CERTIFICATE

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5                 I, CAROLE K. BRIGGS, Licensed Court Reporter  
6         within and for the State of Tennessee, do hereby certify  
7         that the above deposition was reported by me and that  
8         the foregoing pages of the transcript is a true and  
9         accurate record to the best of my knowledge, skills, and  
10      ability.

11                 I further certify that I am not a relative,  
12         counsel or attorney of either party nor employed by any  
13         of the parties in this case or otherwise interested in  
14         the event of this action.

15                 IN WITNESS WHEREOF, I have hereunto affixed my  
16         official hand on this 18th day of October 2024.

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Carole K. Briggs

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23         CAROLE K. BRIGGS

24         Shorthand Reporter

25         Tennessee License No. 345

Briggs & Associates 615/482-0037